

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997)


Docket No. R97-1 4 36 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

NASHUA PHOTO INC., DISTRICT PHOTO INC.,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
THIRD INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS THOMAS M. SHARKEY (NDMS/USPS-T33-25-26)
(September 16, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Nashua Photo Inc. (hereinafter "Nashua"), District Photo Inc. ("District"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") (hereinafter collectively referred to as "NDMS"), proceeding jointly herein, hereby submit the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

Alan Woll

William J. Olson, P.C.

8180 Greensboro Drive, Suite 1070

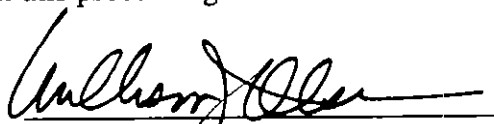
McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Nashua Photo Inc., District Photo Inc.,
Mystic Color Lab, and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

September 16, 1997

NDMS/USPS-T33-25.

Please refer to the response to NDMS/USPS-T33-8, and to page V-36, *Op. & Rec. Dec.*, Docket No. R94-1. Priority Mail's market share is currently under 65 percent, down from 72 percent in 1993 and 76 percent in 1990.

- a. To what do you attribute this decline in market share?
- b. Does the Postal Service from time to time prepare, or have prepared for its use, memoranda, analyses or reports that compare Priority Mail with other competitors in the two-day expedited market?
- c. If your answer is affirmative, please provide copies of all such memoranda, analyses or reports prepared since 1994.
- d. If your answer is negative, please explain why, in view of Priority Mail's deteriorating position in the market, no such analysis is considered necessary.

NDMS/USPS-T33-26.

Do the ODIS data for First-Class flats and IPPs include any pieces that pay Priority Mail rates but, aside from the amount of postage paid, are not otherwise identified as Priority Mail?